

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,
Plaintiff,**

v.

**[1] WANDA VÁZQUEZ GARCED,
[2] JULIO M. HERRERA VELUTINI,
[3] MARK T. ROSSINI,
Defendants.**

CRIMINAL NO. 22-342 (RAM)

PARTIES' JOINT STATUS REPORT

The United States of America and defendants [1] Wanda Vázquez-Garced, [2] Julio M. Herrera Velutini, and [3] Mark T. Rossini, pursuant to the Court's Order (ECF No. 21), hereby provide the following joint status report:

1. As of the filing of this report, all defendants have been arraigned on the charges contained in the indictment.¹

2. The United States has provided initial discovery in the case to all three defendants ("Production #001"), which consists primarily of a copy of the FBI's investigative file (updated to July 28, 2022) and contains approximately 16 gigabytes of data and 24 audio recordings. The United States will be producing the additional entries to the FBI's investigative file generated after July 28, 2022.

3. Additionally, the United States intends to produce additional discovery in the next 14 days, including:

- transcripts of grand jury testimony of all non-law enforcement witnesses;
- and

¹ Ms. Vázquez was arraigned after her arrest on August 4, 2022; Mr. Rossini was arraigned on August 9, 2022; and Mr. Herrera was arraigned on August 31, 2022.

- plea agreements entered into by potential witnesses in this case.

4. In addition, the United States intends to produce copies of the FBI's investigative files in two parallel investigations.

5. Due to the volume of discovery, the parties are requesting that the court schedule a status conference in 70 days.

6. Ms. Vazquez, Mr. Herrera, and Mr. Rossini all agree to toll their speedy trial rights for these 70 days in order to review discovery and file discovery motions.²

Separately, the Government provides notice to the Court that it will be filing an *ex parte* motion under the Classified Information Procedures Act (CIPA). This notice is a representation made to the Court solely by the Government. The defendants do not join this notice and reserve the right to challenge the applicability of CIPA in this case.

WHEREFORE, the parties request that the Court take notice of the foregoing and schedule a status conference in 70 days or a date thereafter that is convenient to the Court, and further request that the Court toll speedy trial until that date.

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will notify all counsel of record.

² The parties are aware that the Court has excluded time periods under the Speedy Trial Act for Ms. Vazquez (ECF No. 17) and Mr. Rossini (ECF No. 21). Nonetheless, Ms. Vazquez, Mr. Herrera, and Mr. Rossini further agree to toll their speedy trial rights for up to 70 days from the date of the Court's order setting the status conference until the date of the status conference.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 6th day of
September, 2022.

COREY R. AMUNDSON
Chief, Public Integrity Section
U.S Department of Justice

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